

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

D.R. HORTON-CROWN, LLC,

Plaintiffs,

v.

FULTON COUNTY, GEORGIA,

Defendant.

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CIVIL ACTION FILE

NO.: 1:16-CV-01318-RWS

**JOINT STIPULATION EXTENDING PLAINTIFF'S TIME TO RESPOND TO
DEFENDANT'S MOTION TO DISMISS**

COME NOW D.R. Horton-Crown, LLC, Plaintiff in the above-styled action, and Fulton County, Georgia, Defendant in the above-styled action, and jointly move this Court to extend the time in which Plaintiff has to respond to Defendant's Motion to Dismiss.

Defendant filed its Motion to Dismiss on April 29, 2016. Per Local Rule 7.1(B), Plaintiff's Response is due on May 13, 2016. Counsel for Plaintiff is requesting an extension of time. Plaintiff's counsel was in Court most of the day Monday and Tuesday. On Wednesday, May 11, 2016, Plaintiff's counsel's office lost power and counsel consequently lost access to the server and was unable to perform the work intended on the Response Brief.

Accordingly, Plaintiff is requesting an extension of time to respond through and including May 24, 2016. As evidenced by the e-signature below, Plaintiff and Defendant's counsel have discussed this date and Defendant is agreeable to this extension.

[Signatures on Following Page]

WHEREFORE the parties request that this Court grant an extension of time for Plaintiff's Response to Defendant's Motion to Dismiss through and including May 24, 2016, and provide Defendants with the appropriate time to provide a Reply pursuant to the Local Rules.

Prepared by and consented to by:

Consented to by:

/s/Joseph W. Cloud

Joseph W. Cloud

Ga. Bar No. 544816

Counsel for Plaintiff

Hecht Walker, P.C.

205 Corporate Center Drive

Suite B

Stockbridge, GA 30281

404-348-4881

/s/Jenise S. Smith

Jenise S. Smith

Ga. Bar. No. 163920

Counsel for Defendant

Office of the Fulton County Attorney

141 Pryor Street

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Atlanta, GA 30303

404-612-0246

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CERTIFICATE OF SERVICE

This is to certify that on this day, the undersigned filed a copy of same with the Clerk of Court using the CM/ECF system which will automatically send email notification to all counsel of record, and served **Joint Stipulation Extending Plaintiff's Time to Respond to Defendant's Motion to Dismiss** upon all parties through electronic filing and U.S. Mail to:

Jenise S. Smith
Office of the Fulton County Attorney
141 Pryor Street
Suite 4038
Atlanta, GA 30303

This _____ day of May, 2016.

HECHT WALKER, P.C.

/s/ Joseph W. Cloud
Joseph W. Cloud
Georgia Bar No. 544816
Counsel for Plaintiff

Hecht Walker, P.C.
205 Corporate Center Dr., Suite B
Stockbridge, Georgia 30281
(404) 348-4881

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CONSENT ORDER

Having considered the parties' Joint Stipulation Extending Time to Respond to Defendant's Motion to Dismiss,

IT IS HEREBY ORDERED that the Plaintiff shall have until May 24, 2016, to respond to the Defendant's Motion to Dismiss and that any response received before or on that date shall indicate that the Motion is opposed.

SO ORDERED this _____ day of May, 2016.

HON. RICHARD W. STORY
Judge, Northern District of Georgia

[Signatures Continue on Following Page]

Prepared by and consented to by:

/s/Joseph W. Cloud

Joseph W. Cloud

Ga. Bar No. 544816

Counsel for Plaintiff

Hecht Walker, P.C.

205 Corporate Center Drive

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404-348-4881

Consented to by:

/s/Jenise S. Smith

Jenise S. Smith

Ga. Bar. No. 163920

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